

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

J.W., a minor, by and through, AMANDA  
WILLAIMS, Guardian and Next Friend, *et*  
*al.*,

Plaintiffs,

Case No. 3:21-cv-00663-CWR-LGI

Hon. Carlton W. Reeves  
Mag. LaKeysha Greer Isaac

v.

THE CITY OF JACKSON, MISSISSIPPI,  
*et al.*,

Defendant.

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**UNOPPOSED MOTION FOR EXTENSION OF TIME IN RESPONSE TO  
THE MOTION TO STRIKE BY DEFENDANT TRILOGY**

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COMES NOW, the Plaintiff J.W., a minor, by and through Amanda Williams as guardian and next friend, (hereafter "Plaintiff"), by and through counsel of record, and respectfully moves for an unopposed extension of the deadline to respond to the Motion to Strike by Defendant Trilogy, as follows:

1. On April 11, 2022, Defendant Trilogy entered a Motion to Strike (ECF No. 71) and a Memorandum of Law in Support of the Motion to Strike (ECF No. 72) against Plaintiff's Amended Complaint (ECF No. 51).
2. Pursuant to L. U. Civ. R. 7(b)(4) "[a]t the time the motion is served.... [c]ounsel for respondent must, within fourteen days after service of movant's motion

and memorandum brief, file a response and memorandum brief in support of the response. Counsel for movant desiring to file a rebuttal may do so within seven days after the service of the respondent's response and memorandum brief. A party must make any request for an extension of time in writing to the judge who will decide the motion."

3. The response from Plaintiff is not due yet, however, Plaintiff requests an extension up to and including May 2, 2022 in which to respond to the Motion to Strike and Memorandum of Law in Support of the Motion by Defendant Trilogy.

4. The undersigned has conferred with counsel for Defendant Trilogy who have no objections to the requested deadline extension.

5. The relief sought will not delay the administration of this matter in any way. Further, this request is being made for good cause and is not made for the purpose of delay, harassment, or any other purpose rooted in bad faith.

WHEREFORE, PREMISES CONSIDERED, the Plaintiff J.W., a minor, by and through Amanda Williams as guardian and next friend, request that this Court enter an order for the extension of deadlines for Plaintiff in both the Response and Response Memorandum Brief. Plaintiff shall be allowed an extension up to and including May 2, 2022 for their response to the Motion to Strike and the Memorandum of Law in Support of the Motion by Defendant Trilogy.

Dated: April 19, 2022.

Respectfully submitted,

**LEVY KONIGSBERG, LLP**

/s/ Kimberly L. Russell

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## **CERTIFICATE OF SERVICE**

I hereby certify that on April 19, 2022, the foregoing document was filed via the U.S. District Court's CM/ECF electronic system and a copy thereof was served upon all counsel of record.

/s/ Kimberly L. Russell  
Kimberly L. Russell